

Retailer Requirements Relating to Age Verification

Dated: 27th MARCH 2025

1. Retailer Obligations

- 1.1. JUUL Labs UK Ltd. ("**Juul Labs**") expects retailers to sell products offered for sale by Juul Labs ("**JUUL products**") responsibly. Retailers committed to adhering to the requirements set forth in this Retailer Requirements relating to Age Verification ("AV Policy") are recognized as authorised retailers of JUUL products ("**Authorised Retailers**"). Juul Labs reserves the right to prohibit its distributors and wholesales from selling to any retailer that is not an Authorised Retailer.
- 1.2. It is illegal to sell JUUL products to any person who is not of legal age to purchase tobacco or nicotine-products (an "Underage Individual"). Authorised Retailers must implement and have in place, prior to selling any JUUL Products, the controls set forth below.
 - 1.2.1. **In store sales:** Authorised Retailers selling JUUL products at physical retail locations must comply with the following age verification requirements at each location where JUUL products are sold:
 - 1.2.1.1. No sale of JUUL products to an Underage Individual shall be permitted.
 - 1.2.1.2. Authorised Retailers must require sales clerks to check a government-issued photo ID of any consumer appearing to be under the age of 25 to verify that the consumer is not an Underage Individual (referred to as "Challenge 25/Think 25"), including if the purchase is by way of self-service checkout, and with respect to non-complying sales clerks, shall implement measures that are reasonably designed to prevent future instances of non-compliance.
 - 1.2.1.3. Authorised Retailers must display appropriate signage to notify customers that products containing nicotine cannot be sold to persons under 18 years of age or other signage that communicates age restrictions required by law.
 - 1.2.1.4. Authorised Retailers must comply with all applicable laws, rules, regulations and policies that relate and/or apply to the promotion and sale of JUUL products at all retail locations.
 - 1.2.1.5. Authorised Retailers must permit and enable mystery shopping to take place in their store(s) for the purpose of verifying compliance with this AV Policy.
 - 1.2.1.6. Authorised Retailers must take prompt, reasonable measures to address any gaps identified in its age verification controls, including through results of any mystery shops.
 - 1.2.1.7. Authorised Retailers shall allow and complete any Juul Labs sponsored training required pursuant to this AV Policy.
 - 1.2.2. **Online sales:** Authorised Retailers offering products for sale online, whether for delivery or pick up, must comply with the following age verification requirements in respect of all online sales of JUUL products (unless an alternative procedure is otherwise agreed upon in writing with JUUL Labs):
 - 1.2.2.1. No sale of JUUL products to an Underage Individual shall be permitted.
 - 1.2.2.2. Authorised Retailers offering JUUL products for purchase through an online order must implement for such online purchases either of the options below, although Juul

Labs strongly encourages Authorised Retailers to adopt both options when reasonably practical to do so:

- a reliable system that automatically detects and prevents Underage Individuals from placing an online order for JUUL products at the point of sale, and meets the code of practice standards set forth by the British Standards Institute for online age verification PAS (1296:2018), available at <https://knowledge.bsigroup.com/products/online-age-checking-provision-and-use-of-online-age-check-services-code-of-practice>, or
- Implementation of Challenge 25 controls at the point of delivery. In the instance of non-complying deliverers, Authorised Retailers shall implement training and/or corrective actions that are reasonably designed to prevent future instances of non-compliance.

- 1.2.2.3. Authorised Retailers must comply with all applicable laws, rules, regulations and policies that relate and/or apply to the promotion and sale of JUUL products for all sales orders.
- 1.2.2.4. Authorised Retailers must permit and enable mystery shopping to take place for the purpose of verifying compliance with this AV Policy.
- 1.2.2.5. Authorised Retailers must take prompt, reasonable measures to address any gaps identified in its age verification controls, including through results of any mystery shops.
- 1.2.2.6. Authorised Retailers shall allow and complete any Juul Labs sponsored training required pursuant to this AV Policy.

2. Enforcement

- 2.1. A breach of any of the requirements set forth herein may result in mandatory training or escalating penalties that vary depending on whether the violations occur at a physical retail store or in an online purchase, as set forth herein.
 - 2.1.1. **First Violation** - Written warning.
 - 2.1.2. **Second Violation** - Completion of the training program completions as outlined in Section 3.
 - 2.1.3. **Subsequent Violation(s)** - May include continued training or further enforcement options, including, but not limited to, suspension from status as an Authorised Retailer for a period of time commensurate with the severity of the violation(s) and the Authorised Retailer's response thereto.
- 2.2. Any Authorised Retailer that in good faith believes that the notification of a failed mystery shop is incorrect may reach out to retailcompliance@juul.com. Upon the presentation of persuasive evidence by such Authorised Retailer, Juul Labs UK may rescind the failed audit notification.

3. Proactive Training and Education Programme ("TEP")

- 3.1. Authorised Retailers receiving a written notification for a second consecutive failure to comply with the AV Policy in the period of one year shall complete Juul Labs sponsored TEP or will be required to attest to the execution of an internal TEP program completion that Juul Labs has determined is reasonably equivalent, and shall display signage that communicates to customers their commitment not to sell tobacco and other nicotine products to Underage Individuals
- 3.2. The TEP will include proactive engagement by Juul Labs and/or a representative acting on behalf of Juul Labs with appropriate representatives of the store by undertaking, for example, some or all of the following activities:
 - 3.2.1. Delivery of, free-of-charge, age verification POS materials which the Retailer shall ensure are displayed in store.
 - 3.2.2. Delivery of in person and/or online "Challenge 25/Think 25" training.